

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	Chapter 11
Stream TV Networks, Inc. and Technovative Media, Inc.,  Debtors. <sup>1</sup>	Bankr. Case No. 23-10763 (MDC)
Stream TV Networks, Inc., et al.  Plaintiffs  v.  Shadron L. Stastney, <i>et al.</i>  Defendants.	Adv. Case No. 23-00057 (MDC)

**SEECUBIC, INC.’S MOTION TO DISMISS THE COMPLAINT**

Pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure made applicable by Federal Rules of Bankruptcy Procedure 7008, 7009, and 7012, Defendant SeeCubic, Inc. (“SeeCubic”) hereby moves this Court for an Order dismissing Debtors’ Complaint. In support of this Motion, SeeCubic incorporates herein its accompanying Memorandum of Law.

WHEREFORE, SeeCubic requests that the Court enter the proposed Order and dismiss Debtors’ Complaint with Prejudice.

---

<sup>1</sup> The Debtors, along with the last four digits of the Debtors’ federal tax identification numbers, are Stream TV Networks, Inc. (4092) and Technovative Media, Inc. (5015). The location of the Debtors’ service address is 2009 Chestnut Street, 3rd Floor, Philadelphia, PA 19103.

Dated: November 13, 2023

Respectfully submitted,

**SKADDEN, ARPS, SLATE, MEAGHER &  
FLOM LLP**

/s/ Joseph O. Larkin

Joseph O. Larkin (I.D. No. 206047)  
920 N. King Street, One Rodney Square  
Wilmington, Delaware 19801  
Telephone: (302) 651-3000  
Facsimile: (302) 651-3001

- and -

James J. Mazza, Jr. (admitted *pro hac vice*)  
Justin M. Winerman (admitted *pro hac vice*)  
Rebecca L. Ritchie (admitted *pro hac vice*)  
155 North Wacker Drive  
Chicago, Illinois 60606-1720  
Telephone: (312) 407-0549  
Facsimile: (312) 407-8641

- and -

Eben P. Colby (admitted *pro hac vice*)  
Marley Ann Brumme (admitted *pro hac vice*)  
500 Boylston Street, 23rd Floor  
Boston, Massachusetts 02116  
Telephone: (617) 573-4800  
Facsimile: (617) 573-4822

*Counsel for SeeCubic, Inc.*